

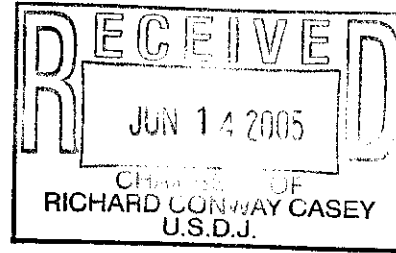
MEMO ENDORSED

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Donald A. Klein (DK7821)
 SCHIFF HARDIN LLP
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Attorneys for Defendants

Schreiber & Zindel,
 Frank Zindel, Engelbert Schreiber,
 and Engelbert Schreiber, Jr.



MEMO ENDORSED

UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (RCC) ←
 ECF Case

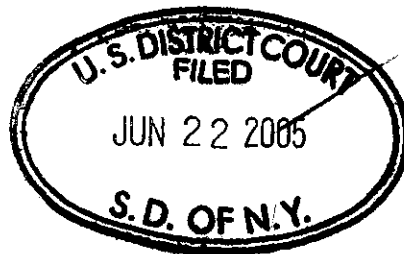
This document relates to:

*Estate of O'Neill, et al. v. The Republic of Iraq, et al., Case No. 04 CV 1076
 (RCC) (S.D.N.Y.)*

*Estate of O'Neill, et al. v. Al Baraka, et al., Case No. 04 CV 1923 (RCC)
 (S.D.N.Y.)*

NOTICE OF MOTION FOR ADMISSION PRO HAC VICE

PLEASE TAKE NOTICE that, upon the accompanying Declaration of Donald A. Klein dated June 10, 2005 and the exhibits annexed thereto, and upon all prior papers and proceedings, Defendants Schreiber & Zindel, Frank Zindel, Engelbert Schreiber, and Engelbert Schreiber, Jr. ("Defendants") will move this Court on a date to be determined, upon submission, unless otherwise ordered by the Court, pursuant to Rule 1.3(c) of the Local Civil Rules of the United States District Court for the Southern District of New York, for an order permitting John N. Scholnick and Ayad P. Jacob of the law firm of Schiff Hardin LLP, Chicago, Illinois, counsel



Application granted 6/20/05

Richard Conway Casey

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for Defendants, to practice before this Court in connection with all proceedings in these matters.

Dated: New York, New York
June 10, 2005



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**UNITED STATES DISTRICT COURT
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(S.D.N.Y.)*

**DECLARATION IN SUPPORT OF
APPLICATION FOR ADMISSION PRO HAC VICE**

Donald A. Klein declares as follows:

1. I am a member in good standing of the Bar of the State of New York and of this Court, and I am of counsel to Schiff Hardin LLP, counsel for Defendants Schreiber & Zindel, Frank Zindel, Engelbert Schreiber, and Engelbert Schreiber, Jr. ("Defendants"). I submit this declaration in support of Defendants' Motion for an order permitting John N. Scholnick and Ayad P. Jacob to practice before this Court in connection with all proceedings in these matters.
2. Plaintiffs' counsel has consented to this application.

3. Mr. Scholnick is a member of Schiff Hardin LLP, practicing in the Chicago office located at 6600 Sears Tower, Chicago, Illinois 60606. Mr. Scholnick is a member in good standing of the Bars of the States of Illinois and California.


4. Mr. Jacob is associated with Schiff Hardin LLP, also practicing in the Chicago office. Mr. Jacob is a member in good standing of the Bar of Illinois.

5. In compliance with Rule 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, I have annexed as Exhibit A a Certificate of Good Standing for Mr. Scholnick issued within the past thirty days by the Clerk of the Supreme Court of Illinois. I have annexed as Exhibit B a Certificate of Good Standing for Mr. Scholnick issued within the past thirty days by the Clerk of the Supreme Court of California. Annexed hereto as Exhibit C is an Affidavit by Mr. Scholnick, sworn to June 3, 2005. Defendants respectfully request that this affidavit be considered part of his application for admission *pro hac vice* in this case.

6. In compliance with Rule 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, I have annexed as Exhibit D a Certificate of Good Standing for Mr. Jacob issued within the past thirty days by the Clerk of the Supreme Court of Illinois. Annexed hereto as Exhibit E is an Affidavit by Mr. Jacob, sworn to June 9, 2005. Defendants respectfully request that this affidavit be considered part of his application for admission *pro hac vice* in this case.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
June 10, 2005


Donald A. Klein (DK7821)

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